

REMARKS/ARGUMENTS

Claims 1-22 and 24-27 were rejected under § 102 as being anticipated by the International Publication WO 98/50719 (De Groot).

Claim 1 has been amended to incorporate the limitations of cancelled Claims 2 and 3. Accordingly, Claim 1 requires that the tensioning device have multiple units mounted around the fibre rope axis, each having at least one contact pad for engaging the fibre rope over a corresponding part of its circumference, and wherein each contact pad has a curved contact surface whose radius of curvature is substantially greater than the radius at which the pad is arranged to engage the rope.

The De Groot reference generally discloses a tensioner for clamping cables, flexible pipes or bars, and moving them forward in a controlled manner. Referring to Figures 5 and 6 of the De Groot reference, it is seen there, as well as the statement in De Groot on page 6, lines 6-7 that "it is advantageous if the clamping members 35 have an essentially annular or v-shaped recess 40 on the outwardly directed surfaces". In other words, the radius of curvature of the contact surfaces of the pads in the De Groot reference are substantially opposite of what is now claimed in amended Claim 1; as clearly shown in Figures 5 and 6, the radius of curvature for the contact pads in De Groot are much less than the radius at which the pad is arranged to engage the pipe, cable or bar.

The De Groot reference also mentions on page 2, lines 10-12 that it is generally undesirable for a structure such as a flexible pipe to be pressed into a shape by two conveyors therefore, three or four conveyors are preferable. In the present invention, because the radius of

curvature of the contact pads are substantially greater than the radius at which the pad is arranged to engage the rope, there is some deformation of the rope being handled and in the present case, pressed into a triangular shape (if utilizing three tracks), or square shape (if utilizing four tracks). This deformation is therefore something that the De Groot reference teaches away from by incorporating contact pads having the small radius of curvature as compared to the devices being handled.

Claims 4-18 depend directly or indirectly from Claim 1. Therefore Claims 1-18 clearly distinguish over the De Groot reference.

Independent Claim 19 is a method claim that requires supporting a load from a vessel at sea using fibre rope wherein a tensioning device is mounted substantially vertically to said vessel and used to grip the fibre rope, said tensioning device supporting the load and facilitating the paying out of and hauling in of the rope. The De Groot reference simply fails to disclose the use of fibre rope and wherein fibre rope is gripped using a tensioning device mounted substantially vertically to the vessel. There is a technical prejudice that fibre rope cannot be used for deployment in deep water since it has poor tolerance to fatigue and cannot be used with many current winch designs. Therefore, Claim 19 overcomes problems in the prior art wherein a vertical tensioning means is provided, such as those usually used to lay pipe, but not fibre rope. Absent the De Groot reference disclosing fibre rope, this reference cannot anticipate Claim 19. Claims 20-22 depend directly or indirectly from Claim 19 and therefore also distinguish over the De Groot reference.

Independent Claim 24 is allowable for the same reason as set forth above with respect to independent Claim 1. Claim 24 requires that a contact area of each pad is curved and a radius of

Application No. 10/506,392

curvature of a contact surface of each pad is substantially greater than the radius at which the pad is arranged to engage the rope.

Claims 25-27 depend directly or indirectly from Claim 24. Therefore, Claims 24-27 also distinguish over the De Groot reference and this rejection under § 102 should be withdrawn.

Based upon the foregoing, Applicants believe that all pending claims are in condition for allowance and such disposition is respectfully requested. In the event that a telephone conversation would further prosecution and/or expedite allowance, the Examiner is invited to contact the undersigned.

Respectfully submitted,

SHERIDAN ROSS P.C.

By: Brent P. Johnson

Brent P. Johnson
Registration No. 38,031
1560 Broadway, Suite 1200
Denver, Colorado 80202-5141
(303) 863-9700

Date: January 7, 2007